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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

JOSE REYNOSO,)	
)	No. C-10-00098 SC
Plaintiff,)	
)	STIPULATION TO EXTEND PERIOD TO
v.)	CALCULATE INTEREST AND
)	Proposed ORDER
UNITED STATES OF AMERICA,)	
)	
Defendant.)	
_____)	

1. On December 21, 2010, the Court granted summary judgment in favor of the government in the above-captioned matter.

2. The Court incorporated into its order the requirement that the parties meet and confer to determine the amount of interest on the remaining amount due plaintiff.

3. The Court further ordered the parties to provide a joint or separate declaration within ten days of its order.

4. Counsel for the government will be out of the Country for the period December 23, 2010 to January 3, 2011.

5. The government will require the coordination of the Internal Revenue Service to complete the interest calculation for purposes of judgment.

6. Accordingly, the parties stipulate and respectfully request the Court to extend the period to calculate interest and file their joint or respective declarations until Tuesday, January 18, 2011.


Respectfully submitted,

MELINDA HAAG
United States Attorney

_____/s_____
BLAKE D. STAMM
Assistant United States Attorney

_____/s_____
PAUL HAM
Attorney for Plaintiff, Jose Reynoso

SO ORDERED, this 27 day of Dec., 2010.



THE HONORABLE SAMUEL CONTI
United States District Judge
Northern District of California